

816.474.1500
816.304.1294

218233

USCG-2002-14069-21

SHEET NO. 1 OF 3
PROJECT NO. _____
DATE 31 JAN 03
BY _____
CHK'D _____

TRC

Customer-Focused Solutions

SUBJECT FOR THE DOCKET

DR BILL FLYNT, VP
TRC INFRASTRUCTURE SECURITY

TOPIC 3: CONSIDERATION OF OTHER ORGANIZATIONS COMPETENT IN
MARITIME SECURITY

POINT 1: SECURITY ASSESSMENTS WILL REQUIRE OUTSIDE
EXPERTISE IN MULTIPLE DISCIPLINES

POINT 2: TRC INFRASTRUCTURE SECURITY SUPPORTS THE
FORMALIZATION OF PROFESSIONAL STANDARDS
FOR CONDUCTING THREAT & VULNERABILITY
ASSESSMENTS OF PORT FACILITIES

POINT 3: USCG SHOULD CONDUCT OUTREACH TO
PROFESSIONAL SECURITY ORGANIZATIONS
AND COMPANIES TO DETERMINE STANDARDS

POINT 4: EXISTING METHODOLOGIES EMPLOYING
PROBABILITY & SEVERITY ANALYSIS ARE
INADEQUATE IN ASSESSING COURSES OF
ACTION AVAILABLE TO THREATS AS THEY
ARE DESIGNED FOR EMPIRICAL DATA
ANALYSIS OF HAZARDS & ACCIDENTS

TRC
Customer-Focused Solutions

SUBJECT

Federal Register Vol 67, No 250

☐ DR BILL FLYNT
TRC INFRASTRUCTURE SECURITY
1600 GENESSEE ST, SUITE 416
KANSAS CITY, MO 64102
816-474-1500
FAX: 816-474-1853
Bill.Flynt@trcsolutions.com

ITEM 9. PORT SECURITY ASSESSMENTS REQUIREMENT

POINT 1: DOES PORT SECURITY COMMITTEE POSSESS SUFFICIENT
EXPERTISE & EXPERIENCE TO DEVELOP PSA?

NO; ASSESSMENT MUST INCLUDE A COMPREHENSIVE
ASSESSMENT OF OTHER INFRASTRUCTURES, AND
PARTICULARLY THE ENERGY INFRASTRUCTURE.



Customer-Focused Solutions

SUBJECT

PP. 79747-79749

PUBLIC HEARING FID REGISTER
VOL. 67, NO. 250

□ SECTION 15: VESSEL SECURITY ASSESSMENTS REQUIREMENT

SECTION 25: FACILITY SECURITY REQUIREMENT

SECTION 26 & 27: FACILITY SECURITY ASSESSMENTS

QUESTION: "DO YOU HAVE ANY SUGGESTIONS ON HOW TO BEST
 CONDUCT A VSA AND REVIEW RESULTS? IS
 THERE A CURRENT PRACTICE TO MEET THIS
 REQUIREMENT?"

- RED, GRAY, BLUE[©] METHODOLOGY
 - ENDORSED BY THE NORTH AMERICAN
 ELECTRIC RELIABILITY COUNCIL
 (NERC) AS A TVA METHODOLOGY
- TARSIS METHODOLOGYSM
 - TOTAL ASSESSMENT OF RISK TO
 SYSTEMS AND INFRASTRUCTURE
 SECURITY
- D.O.D TECHNICAL MANUALS FOR DESIGN/ENG OF IS
- SANDIA NATIONAL LABORATORY RISK
 ASSESSMENT METHODOLOGY (RAM)
 MODIFIED TO APPLY TO THE SECURITY
 CONTEXT OF A PORT & ITS FACILITIES
- REGARDLESS OF TVA METHODOLOGY EMPLOYED,
 FOR CRITICAL INFRASTRUCTURE SYSTEMS
 AN INDEPENDANT, 3RD PARTY AUDIT IS
 NECESSARY.